

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

NANCY R., pseudonymously,
Plaintiff(s)

vs.

Case Number: 5:25-cv-00462-G

PLAZA HOTELS, LLC; et al.,
Defendant(s)

CORPORATE DISCLOSURE STATEMENT

Pursuant to Fed.R.Civ.P. 7.1., which states:

A nongovernmental corporate party to an action or proceeding in a district court must file a statement that identifies any parent corporation and any publicly held corporation that owns 10% or more of its stock or states that there is no such corporation.

ESH STRATEGIES FRANCHISE, LLC

[name of party]

who is a (check one) ☐ PLAINTIFF ☒ DEFENDANT in this action, makes the following disclosure:

1. **Is party a publicly held corporation or other publicly held entity?**

(Check one) ☐ YES ☒ NO

2. **Does party have any parent corporations?**

(Check one) ☐ YES ☒ NO

If YES, identify all parent corporations, including grandparent and great-grandparent corporations:

There is no parent "corporation" but there is a parent company identified as ESH Hospitality Strategies LLC.

3. **Is 10% or more of the stock of party owned by a publicly held corporation or other publicly held entity?**

(Check one) ☐ YES ☒ NO

If YES, identify all such owners:

4. **Is there any other publicly held corporation or other publicly held entity that has a direct financial interest in the outcome of the litigation?**

(Check one) ☐ YES ☒ NO

If YES, identify entity and nature of interest:

5. **Is party a trade association?**

(Check one) ☐ YES ☒ NO

If YES, identify all members of the association, their parent corporations, and any publicly held companies that own 10% or more of a member's stock:

DATED this 28th day of May , 2025.

/s/ Patrick B. Moore

Signature

Patrick Bryant Moore (admitted Pro 520390

Printed Name

Bar Number

Weinberg Wheeler Hudgins Gunn & Dial

Firm Name

3344 Peachtree Road, N.E., Suite 2400

Address

Atlanta

GA

30326

City

State

ZIP

(404) 832-9520

(404) 875-9433

Phone

Fax

pmoore@wwhgd.com

Email Address

CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2025, I electronically transmitted the foregoing **Corporate Disclosure Statement** to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Fletcher D. Handley, Jr.
THE HANDLEY LAW CENTER
111 S. Rock Island Ave.
El Reno, OK 73036
fdh@handleylaw.com
Counsel for Plaintiff

Geoffrey C. Parker
HILTON PARKER, LLC
7658 Slate Ridge Blvd.,
Reynoldsburg, OH 43068
gparker@hiltonparker.com
Counsel for Plaintiff

Michael C. Kane
THE 702 FIRM INJURY ATTORNEYS
400 South 7th Street, Suite 400
Las Vegas, NV 89101
Attorney for Plaintiff

Bart Jay Robey
Eric A. Moen
Abby R. Herren
CHUBBUCK DUNCAN & ROBEY, P.C.
1329 Classen Drive
Oklahoma City, OK 73103
eamoen@chubbucklaw.com
Counsel for Defendant OKC Airport ES

Charles D "Buddy" Neal, Jr.
Philard L. Rounds Jr.
Jamie A. Rogers
STEIDLEY & NEAL
CityPlex Towers 53rd Fl.
2448 East 81st Street
Tulsa, OK 74137
cdn@steidley-neal.com
plr@steidley-neal.com
jar@steidley-neal.com
Counsel for ESH Strategies Franchise

Jonathan Wilfong
OYO HOTELS, INC.
440 Louisiana Street, Suite 1050
Houston, TX 77002
Attorney for G6 Hospitality Franchising

David C. Senger
Hunter M. Siex
COFFEY, SENGER & WOODARD PLLC
4725 East 91st Street, Suite 100
Tulsa, OK 74137
david@cswlawgroup.com
hunter@cswlawgroup.com
Counsel for Defendant Jaliyan Hospitality

Michael S. Linscott
DOERNER, SAUNDERS, DANIEL & ANDERSON
700 Williams Center Tower II
Two West Second Street
Tulsa, Oklahoma 74103-3522
mlinscott@dsda.com

Kaylee Davis-Maddy
DOERNER, SAUNDERS, DANIEL & ANDERSON
210 Park Avenue, Suite 1200
Oklahoma City, OK 73102
kmaddy@dsda.com
Counsel for Super 8 Worldwide, Days Inns Worldwide, Ramada Worldwide, & Howard Johnson International

James K. Secrest, III
Emma C. Kincade
SECREST, HILL, BUTLER & SECREST
7134 S. Yale Avenue, Ste. 900
Tulsa, OK 74136
jsecrest3@secresthill.com
ekincade@secresthill.com
Counsel for Chand & Saaj Hospitality, Inc.

In addition, I certify that on May 28, 2025, I also served the same document via USPS First-Class mail on the following, who are not registered participants of the ECF system:

YASH ENTERPRISES, INC.
c/o Tushar Natha
400 S. Meridian
Oklahoma City, OK 73108

PLAZA HOTELS, LLC
3200 S 1-35 Service Road
Oklahoma City, OK 73129

INDRA, LLC
c/o Ramesh Patel
11935 N. 1-35 Service Rd.
Oklahoma City, OK 73131

Michael A. Wiley
1701 Wildhorse Dr.
Edmond, OK 73003

OM, LLC
c/o Ramesh V. Patel
12001 N I-35 Service Road
Oklahoma City, OK 73131

KAJAL HOSPITALITY, LLC
c/o Jaydip Modi
1120 S 10th St.
Clinton, OK 73601

NOOR HOTEL, LLC
c/o Abdel Jawabreh
3213 Meadow Lane
Edmond, OK 73103

AMBICA, LLC
c/o Prakash Patel
5608 NW 107th St.
Oklahoma City, OK 73162

/s/ *Patrick B. Moore*

Patrick B. Moore (*admitted pro hac vice*)